

Green, LindaE

From: Albright, Scott
Sent: Thursday, September 15, 2016 11:56 AM
To: FOIA HQ
Cc: Dubbs, Kimberly
Subject: new FOIA request to be assigned
Attachments: McShan subpoena 9.15.16.pdf

Hello,

Please find attached a subpoena for documents and accompanying material that should be assigned a new FOIA number and entered into EPA's FOIA tracking system. The subpoena, which includes the description of the documents requested, is on the final page of the attachment. The new FOIA request should be assigned to OCFO.

Please also note:

- 1) That the subpoena includes an individual's social security number, which should be redacted, if the document is posted publicly or otherwise distributed outside of the Agency.
- 2) That EPA's response to the request should be consistent with OPM regulation 5 CFR 293.311.

Finally, please provide me with the new FOIA tracking number once it is issued, so I may provide it in a letter to the requester.

Thanks,

Scott Albright
U.S. EPA
Office of General Counsel
Intellectual Property Law &
Information Law practice groups
(202) 564-2884

SHEENA C. MCSHAN
ATTORNEY AT LAW

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Mail correspondence to:
P.O. Box 500876
Atlanta, GA 31150

August 15, 2016

US-EPA 9T25
Human Resources
61 Forsyth SW
Atlanta, GA 30303

Re: Tina L. Greene v. Warren K. Greene
Civil Action No. 16-1-00919-52

Dear Sirs:

Enclosed herewith please find Plaintiff's Subpoena for Production of Documents with regard to the above case. This law firm represents Tina L. Greene in her domestic case. If there are costs associated with this Subpoena, please notify my office so that those amounts can be forwarded to you. If the documents you have in response to this Request are voluminous, I will be more than happy to send a courier to your office to obtain these documents at a convenient time. Also, it is more expedient; please feel free to deliver these documents to me electronically via the above email address (scmcschan@yahoo.com) rather than having to make copies of everything.

This Request is being served on you in accordance with O.C.G.A. §9-11-35. Georgia law requires that you provide me with the requested documents on or before the date indicated on the Subpoena, September 2, 2016, unless you receive a formal written objection from the opposing party. Should the opposing party have objections to your producing these documents, you will receive a written objection from them. You, by necessity, must be notified of any such objection in writing. Should you fail to receive notice that an objection has been filed, you should comply with this Request, as provided by the law of this State.

This Request is designed to save everyone time, including the Court, and is not intended in any way to inconvenience you. The disclosure of records on a prompt and inexpensive basis serves to promote the compromise and settlement of lawsuits and avoids the necessity of depositions and court appearances.

16 SEP -5 AM 8:1

Thank you in advance for your prompt cooperation and response to the enclosed Subpoena. For convenience, the documents requested may be produced directly to me in my office before the date indicated to conserve time. A Certificate of Authenticity is enclosed herein for your use when producing the responsive documents.

Please do not hesitate to contact me with questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Sheena C. McShan', with a stylized, flowing script.

Sheena C. McShan

encl

15 SEP 09 08:40

IN THE SUPERIOR COURT OF COBB COUNTY
STATE OF GEORGIA

TINA L. GREENE
Plaintiff

vs.

WARREN K. GREENE
Defendant

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* CIVIL ACTION
* FILE NO. 16-1-00919-52
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CERTIFICATE OF AUTHENTICITY

This is to certify that I, _____, am the Custodian of the Records for US-EPA. I am familiar with the method of which US-EPA maintains its records. The within, _____ pages in all, which have been produced pursuant to SUBPOENA FOR THE PRODUCTION OF DOCUMENTS, are true and accurate copies of the employment files, account statements and records of Warren Keith Greene which US-EPA keeps in the regularly conducted activity, as it is the custom of US-EPA to keep such records; that it was made at the time of the events; and that it was made by, or from information transmitted by, a person with personal knowledge and a business duty to report.

Signature

Printed Name

Title

Sworn to and subscribed before me
this _____ day of _____, 2016.

Notary Public

My Commission Expires: _____

16 SEP - 6 AM 8:40

IN THE SUPERIOR COURT OF COBB COUNTY
STATE OF GEORGIA

TINA L. GREENE
Plaintiff

vs.

WARREN K. GREENE
Defendant

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* CIVIL ACTION
* FILE NO. 16-1-00919-52
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CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the attached Subpoena for Production of Evidence to US-EPA on Defendant's attorney of record by depositing a copy of same in the United States Mail, postage prepaid, to:

Rhonda Breaux Kunkle
166 Anderson St. Ste 226
Marietta, GA 30060

This 15th day of August, 2016.



Sheena C. McShan
Attorney for Plaintiff
Georgia Bar No. 499444

Post Office Box 500876
Atlanta, Georgia 31150
Phone (678) 873-4465
Fax (678) 668-7416

16 SEP 06 2016 08:40

SUBPOENA FOR THE PRODUCTION OF EVIDENCE

STATE OF GEORGIA
COBB COUNTY

TO: US EPA 9125 - Human Resources Office

You are hereby required to be and appear at the Cobb County Superior Court before

A. Gregory Poole, Judge of the Superior Court, in Room 7300 of the Cobb County Courthouse at 9 o'clock A.M./P.M. on the 7th day of September, 2016.

and to bring with you into said Court certain employment, wage, benefit information to be used as evidence by Plaintiff & her attorney in a certain case pending in said Court between Tina L. Greene and Warren K. Greene, Case No. 16-1-00919-52

The following are hereby subpoenaed: In regards to Defendant/Respondent

Warren Keith Greene, DOB [] SSN []

In lieu of appearance, please provide true and correct copies of the following requested materials and certify to their authenticity to Plaintiff's attorney at the address below on or before September 2, 2016:

- 1) Documentation of date of hiring and beginning salary, including offer letter + contra
- 2) Paystubs/earning statements from January 1, 2013 to present
- 3) W-2 forms for tax years 2013, 2014 and 2015
- 4) Any documentation showing Mr. Greene has earned or is entitled to earn bonuses, fringe benefits, incentives, options etc from January 1, 2013 to present

Herein fail not, under penalty of the law.

Witness, A. Gregory Poole, Judge of said Court

this 15th day of August, 2016.

If you have questions contact Attorney for Plaintiff/Defendant

Sheena C. McShan, Esq
P.O. Box 560876
Atlanta, GA 31150
Phone 678-873-4465

Clerk, Superior Court

Sheena C. McShan